



EAI Response to CER National Smart Metering
Programme Policy Consultation Paper on Regulating the
Transition Activities of Market Participants.

Electricity Association of Ireland
Smart Metering Task Force



127 Baggot Street Lower
Dublin 2

EU Transparency Register No: 400886110592-21

CONTENTS

INTRODUCTION	3
REGULATION OF TRANSITION ACTIVITIES.....	3
TEST PLANNING AND APPROACH.....	3
CLOSING REMARKS	4

The Electricity Association of Ireland (EAI) is the trade association for the electricity industry on the island of Ireland, including generation, supply and distribution system operators. It is the local member of Eurelectric, the sector association representing the electricity industry at European level.

EAI aims to contribute to the development of a sustainable and competitive electricity market on the island of Ireland. We believe this will be achieved through cost-reflective pricing and a stable investment environment within a framework of best-practice regulatory governance.



Electricity Association of Ireland
Tel: +353 1 5242726
www.eaireland.com

Introduction

The EAI Smart Meter Task Force welcomes the opportunity to respond to the following CER policy consultation paper CER/15/273 Regulating the Transition Activities of Market Participants.

Overall, suppliers are broadly supportive of the obligations placed upon participants during transition in the National Smart Meter Programme. However, concerns remain and we set them out here for consideration and with an expectation that they may be addressed in the final policy decisions to the benefit of consumers' interests and realisation of programme goals.

Regulation of Transition Activities

We understand the license obligations placed upon network operators for electricity and gas. A clear owner of the national rollout plan is essential. We also welcome the obligation to engage and consult with industry stakeholders when developing rollout and test plans and would argue for more direct participation by Suppliers in the rollout programme. The national meter rollout will be complex and demanding and a co-ordinated approach amongst all stakeholders ensures the most positive customer outcome.

Some aspects of the rollout remain unclear. CER is responsible for assessing participant readiness. This is understandable. However, there are no readiness criteria documented or indicated and therefore, the programme risks the introduction of subjective readiness criteria. We think it is far more preferable to introduce clear, objective readiness criteria as early as possible in the process so that participants can incorporate into their own planning and ensure early compliance. The programme should also address and assign responsibility for consumer readiness.

Suppliers propose that the two Network companies should be directed to work in unison to derive an installation methodology that fulfils an obligation of one resource installing both the Gas and Electricity meters for a dual fuel customer. This approach will have a positive impact on the CBA, will reduce administration, and will result in a better experience for the customers.

Test Planning and Approach

Similarly, test planning will be led by Network Operators. We expect this to be complex and lengthy and therefore to be a material cost in the National Programme's CBA to be executed in 2016.

It is vital, therefore, that suppliers have an understanding of the market readiness test strategy, scope and approach early in 2016 so that it is accurately reflected in our CBA submissions and adequately resourced in our planning and budgeting through the rollout period.

Suppliers believe that the obligation to develop a Coordinated Testing & Trialling plan should rest with the CER in order to ensure an independent perspective on testing. We believe that accountability for the substantial testing requirement should not rest with any individual stakeholder but should be an integral part of the CER's programme governance. We propose that a CER appointed Test Programme Manager role is put in place in advance of deployment and rollout.

Closing Remarks

The EAI has commented on items arising in the proposed decision paper where there is consensus among its members. The points outlined above are important points for the CER to consider so that an optimal policy position for the industry can be found within the constraints of the programme and its cost benefit analysis. The supplier members of the EAI will each be providing more detailed individual responses to the proposed decision paper.

22nd January 2016